

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

FILED

SEP 24 2012

JULIE A. RICHARDS, CLERK
US DISTRICT COURT, EDNC
BY MV DEP CLK

GUSTAVO ROMANELLO

ACELA ROMANELLO) **civil action No. 5:12 cv 371-FL**

Vs.)

BANKUNITED, INC . et al

PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO ANSWER

DEFENDANTS MOTION TO DISMISS AMENDED COMPLAINT

COMES NOW Plaintiffs Gustavo Romanello and Acela Romanello, and hereby move this Court to extend the time to answer Defendants Motion to Dismiss Amended Complaint for fourteen (14) days, through and including October 8, 2012.

- 1. The time for answering Defendants Brock & Scott, PLLC and Trustee Services of Carolina, LLC has not expired and the current deadline is September 24, 2012, and for Defendants BANKUNITED, INC. , Ragsdale & Liggett, PLLC and Ashley H. Campbell the deadline is September 28, 2012.**
 - 2. The movants need additional time to investigate and learn facts of the matter to respond Defendants motion.**
 - 3. Counsel for BANKUNITED was contacted by Plaintiffs last week and she graciously consented for this request for an extension of time.**

- 1 **4. Plaintiffs left a voice mail message and an email message with counsels for Brock &**
2 **Scott, Trustee Services of Carolina, LLC, Ragsdale Liggett, PLLC and Ashley H.**
3 **Campbell and haven't yet received any answer.**
- 4 **5. Upon information and belief, Defendants will not suffer any prejudice as a result of**
5 **this extension of time and this motion.**

7
8 **WHEREFORE, the Plaintiffs respectfully request that the Court grant this Motion for**
9 **extension of time to answer Defendants Motion to Dismiss Amended Complaint up to and**
10 **including October 8, 2012.**

12
13 **This the 24th of September, 2012**

14
15 **Gustavo Romanello**

16 **Acela Romanello**

17 **Plaintiffs**

Gustavo Romanello
Acela Romanello

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CERTIFICATE OF SERVICE

**The undersigned hereby certify that on September 24th, 2012 a copy of the foregoing Motion
for extension of time to answer Defendants Motion to Dismiss Amended Complaint was
served upon all parties to this action as follows:**

Sean T. Partrick	Travis E. Menk
YATES McLAMB & WEYHER, LLP	BROCK & SCOTT, PLLC
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Raleigh, NC 27601	Charlotte, NC 28217
Counsel for BANKUNITED, INC	Counsel for Brock & Scott, PLLC
	And for Trustee Services of
	Carolina, LLC

1 **J. Whitfield Gibson Robert S. Shields jr.**

2 **MANNING FULTON & SKINNER, P.A.**

3 **3605 Glenwood Ave., Ste. 500**

4 **Raleigh, NC 27612**

5 **Counsels for Ragsdale Liggett, PLLC**

6 **And for Ashley H. Campbell**

7 **This the 24th day of September, 2012**

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11 **Gustavo Romanello**

12 **Acela Romanello**

Gustavo Romanello
Acela Romanello

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